

AO 91 (Rev. 11/11) Criminal Complaint

## UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States Courts  
Southern District of Texas  
FILED

United States of America

v.

John Charlie KOFRON, aka "Jay C"

Case No. C-20-1188M

MAY 26 2020

David J. Bradley, Clerk of Court

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 25, 2020 in the county of Nueces in the  
Southern District of Texas, the defendant(s) violated:

## Code Section

21 U.S.C. § 841 (a)(1)

## Offense Description

Knowingly, intentionally and unlawfully possessed with the intent to distribute a controlled substance in Schedule II of the Controlled Substance Act of 1970, to wit: 63 grams, approximate gross weight, of crack cocaine.

This criminal complaint is based on these facts:

See Attachment A

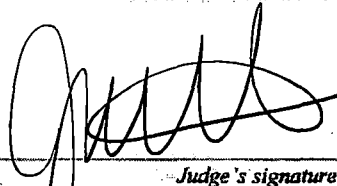
☒ Continued on the attached sheet.

Submitted by reliable electronic means, sworn to, signature attested telephonically per Fed.R.Crim.P. 4.1, and probable cause found:

Date: May 26, 2020City and state: Corpus Christi, Texas  
Complainant's signature

Andy Trevino, Task Force Officer

Printed name and title

  
Judge's signature

Julie K. Hampton, U.S. Magistrate Judge

Printed name and title

ATTACHMENT "A"

KOFRON, John Charlie, aka "Jay C"

On May 20, 2020, United States Magistrate Judge Julie Hampton signed a Federal Search Warrant for the residence of John KOFRON who resides in Corpus Christi, Texas.

On May 25, 2020, Agents of the DEA Corpus Christi Resident Office established surveillance in the 4000 block of Teak Street in Corpus Christi, Texas. During surveillance efforts, Agents observed a Chevrolet Tahoe leave the residence of KOFRON. Agents observed that the vehicle was occupied by KOFRON, who was the driver, and a passenger hereafter referred to as Target 2.

Agents followed the Tahoe to the area of Gollihar Road and Kostoryz road, where at which time the vehicle was stopped by a marked Corpus Christi Police Department unit. KOFRON and Target 2 were detained and escorted by Agents to KOFRON'S residence, in the 4000 block of Teak Street.

Upon arrival at KOFRON'S residence, Agents executed the search warrant and cleared the residence for officer safety purposes. Once cleared, Agents began a systematic search of the residence.

During the search, Agents discovered approximately grams 453 of marijuana, 70 grams of cocaine, and 63 grams of crack cocaine. Agents also discovered a pistol in the master bedroom of the residence.

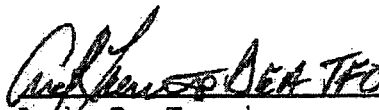
KOFRON was read his Miranda Warning by SA Stewart as witnessed by TFO Hemping. KOFRON acknowledged that he understood his rights by signing the MIRANDA form and agreed to answer questions.

KOFRON stated that the narcotics found in and outside the residence belonged to KOFRON. KOFRON was asked a series of questions but stated that he did not want to make any further statements regarding the narcotics found.

KOFRON was subsequently transferred to the Coastal Bend Detention Center by TFO's Hemping and TFO Martinez for overnight detention. Target 2 was transported to the Nueces County Jail by the Corpus Christi Police Department on state narcotics charges.

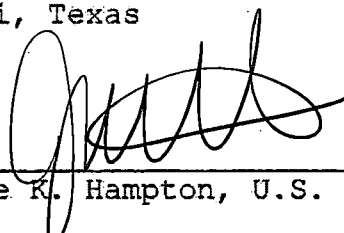
AUSA Lance Watt authorized Federal prosecution of KOFRON.

Distribution may be inferred from the amount of crack cocaine seized.

  
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Andy R. Trevino,  
Task Force Officer, DEA

Submitted by reliable electronic means, sworn to, signature  
attested telephonically per Fed.R.Crim.P 4.1., and probable  
cause found:

Date: May 26, 2020  
City and State: Corpus Christi, Texas

  
\_\_\_\_\_  
Julie R. Hampton, U.S. Magistrate Judge